

B. Amendment to the Drawings

Please replace the drawing sheet presently on file with the enclosed five drawing sheets.

D. Remarks

The claims are 1 and 4-14, with claim 1 being the sole independent claim. Claims 2 and 3 have been cancelled. Claim 1 has been amended to include the subject matter of cancelled claims 2 and 3. Claims 8 and 9 have been amended to reflect the change in claim 1 and to address formal issues raised by the Examiner. New claims 12-14 have been added. Support for these claims may be found, inter alia, in the Examples.

New Figs. 2-5 have been added to show all the features recited in the claims. The Figure and the specification have been amended to reflect the addition of new drawings.

No new matter has been added. Reconsideration of the present claims is expressly requested.

The drawing are objected to by the Examiner under 37 C.F.R. § 1.83(a). Specifically, the Examiner alleged that the drawings do not show every feature of the invention recited in claims 3 and 7-9.

Applicants submit that additional drawings are not necessary for the understanding of the subject matter recited in original claims 3 and 7-9. However, to expedite prosecution, Applicants have added new Figs. 2-5. Accordingly, withdrawal of this objection is respectfully requested.

Claims 3, 8 and 9 are objected to for formal reasons.

In response, Applicants have cancelled claim 3 and amended claims 8 and 9 for clarification. This objection should, therefore, be withdrawn.

Claims 1-6 and 8-11 stand rejected under 35 U.S.C. § 103(a) as being allegedly obvious from U.S. Patent No. 4,522,862 (Bayer) in view of U.S. Patent No. 5,583,704 (Fujii). Claim 7 stands rejected under 35 U.S.C. § 103(a) as being allegedly obvious from Bayer in view of Fujii and further in view of U.S. Patent No. 6,709,119 B2 (Gillich). The grounds of rejection are respectfully traversed.

Prior to addressing the merits of rejection, Applicants would like to briefly discuss some of the key features and advantages of the presently claimed invention. That invention, in relevant part, is directed to a reflection mirror. This mirror includes a reflection layer between an underlying layer and a protective layer, with the underlying layer formed on a resin substrate. Both the underlying layer and the protective layer comprise alternating titanium and aluminum oxide films. Importantly, the underlying layer is formed such that its titanium oxide films are the ones in contact with the substrate and the reflective layer. This improves the adhesion of the reflective layer to the substrate, which results in a more durable mirror.

Bayer is directed to recording medium displays. Bayer discloses a structure in which a silver layer is placed between alternating TiO_2 film and Al_2O_3 film layers. However, Bayer fails to disclose or suggest several features of the presently claimed invention. First, as acknowledged by the Examiner, Bayer does not disclose a resin substrate. Further, Bayer fails to disclose or suggest that a TiO_2 film of the underlying layer should be in contact with the substrate and the silver layer.

The Examiner has relied on Fujii for the disclosure regarding the resin substrate. However, Applicants submit that it would not have been obvious to one of ordinary skill in the art to replace the substrate in Bayer with the one made of resin.

Specifically, Bayer's structure is produced using photolithography. Applicants respectfully submit that a skilled artisan would not use a resin substrate in a photolithographic process.

Nevertheless, even if the disclosure of Bayer and Fujii could be properly combined, the combination would still not yield the structure as presently claimed.

Specifically, neither Bayer nor Fujii disclose or suggest placing the TiO_2 films of the underlying layer in contact with the resin substrate and the reflective layer. As discussed above, placement of the TiO_2 film in this manner leads to improved adhesion. The improved adhesion is clearly demonstrated by the data presented in Table 1, particularly in relation to Example 2 and Comparative Example 4. Accordingly, it would clearly not have been obvious to use the TiO_2 film as presently claimed based on the teachings in Bayer and Fujii. There is simply no motivation to do what Applicants have done.

Gillich cannot remedy the deficiencies of Bayer and Fujii. Gillich was cited for the disclosure of a SiO_x film. However, like Bayer and Fujii, Gillich also fails to disclose or suggest placing the TiO_2 films of the underlying layer in contact with the resin substrate and the silver layer.

Accordingly, Applicants respectfully submit that the cited references, whether considered separately or in any proper combination, do not disclose or suggest the presently claimed elements of the invention. Wherefore, Applicants respectfully request that the outstanding objections and rejections be withdrawn and that the present case be passed to issue.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our

address given below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jason M. Okun", is written over a horizontal line.

Attorney for Applicants

Jason M. Okun

Registration No. 48,512

FITZPATRICK, CELLA, HARPER & SCINTO

30 Rockefeller Plaza

New York, New York 10112-3801

Facsimile: (212) 218-2200

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